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May 17, 2021

Via ECF and Email

The Honorable Coleen McMahon
United States District Court Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *United States v. Sibitri Laforest, Garry Laforest*
21 cr 272

Dear Judge McMahon:

I am appointed to represent Sibitri Laforest and Thomas Dunn, Esq. is appointed to represent Garry Laforest. I write on behalf of my client and with the consent of Mr. Dunn, on behalf of his client. We seek a *nunc pro tunc* amendment of their conditions of bond to allow Mr. and Mrs. Laforest to travel to New York tomorrow morning at 7:00 am from Florida where they reside, to enable the Laforests to meet with their respective counsel on Wednesday May 19th. The present conditions of bond do not provide for the Laforests to travel to see their counsel but allow such travel for court appearance and for an extension of their stay in New York to meet with counsel. Assistant United States Attorney Matthew Shahabian has consented to this one-time *nunc pro tunc* amendment to the conditions of the Laforests' bond.

The following are the conditions of bond as agreed to by the parties and as ordered by Magistrate Judge Robert W. Lehrburger as to both Mr. and Mrs. Laforest.

\$1,000,000.00 PRB;
CO-SIGNED BY 3 FRP'S, - Can use same cosigners as co-defendant;
SECURED BY \$100,000.0 CASH/PROPERTY;
TRAVEL RESTRICTED TO SDNY/EDNY/and SD Fla. only as necessary for court appearances and to meet with counsel before or after court, which must be approved in advance by PTS

DEF. IS PROHIBITED FROM ENTERING AREAS NEAR AIRPORTS EXCEPT FOR TRAVEL AS PERMITTED;
SURRENDER TRAVEL DOCUMENTS (& NO NEW APPLICATIONS);
PRETRIAL SUPERVISION AS DIRECTED BY PRETRIAL SERVICES;
CURFEW;
GPS MONITORING;
DEF. TO CONTINUE OR SEEK EMPLOYMENT;
DEF. TO BE RELEASED ON OWN SIGNATURE;
REMAINING CONDITIONS TO BE MET BY 5/31/21;
DEF. MUST DISCLOSE ALL ACCOUNTS TO PTS;
NO NEW FINANCIAL ACCOUNTS WITHOUT APPROVAL OF PTS.

The Laforests' travel plans to New York were made prior to the setting of the bond today. The plans were made with the approval of their pretrial officer in the Southern District of Florida, Gary Hackett. He was assigned as their pretrial officer upon the Laforests' initial appearance on this matter in the Southern District of Florida. They are not as of yet assigned a pretrial officer in New York. They are required to call Officer Hackett as soon as they land in New York and to remain in contact with him during their stay in New York. They are on GPS monitoring which is under the supervision of Officer Hackett. The Laforests had understood that the conditions of their bond entered in Florida permitted travel to New York to meet with counsel who would be appointed for them by the Court in New York. The Laforests intend to return to Florida either Wednesday evening or as soon thereafter as they can obtain a flight back to Florida. The information regarding their return flight will be forwarded to Office Hackett and to the Government, as well as, to Pretrial Service in New York. The arresting officers seized their passports. I add, because I will be away on vacation starting on May 31st until June 7th, it is important that I confer with Ms. Laforest this week.

Wherefore, on behalf of the Laforests, I respectfully request the Court permit this *nunc pro tunc* amendment to their conditions of bond to allow their travel tomorrow morning to New York to meet with counsel.

Respectfully,

/s/

Donna R. Newman

Cc: AUSA Matthew Shahabian

Thomas Dunn, Esq via email & ECF

Mr. & Mrs. Laforest via email